UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X

Ronald Ruffin, on behalf of himself and all others similarly situated,

Case No. 7:20-cv-5422 (PMH)

Plaintiff,

OFFER OF JUDGMENT

-against-

Kirschenbaum & Phillips, P.C.; LVNV Funding, LLC; Resurgent Capital Services Limited Partnership, a/k/a Resurgent Capital Services LP, f/k/a Alegis Group Limited Partnership; Sherman Financial Group LLC,

Defendants.

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 68, Defendants Kirschenbaum & Phillips, P.C. and LVNV Funding, LLC (collectively, "Defendants") hereby offer to allow Plaintiff Ronald Ruffin ("Plaintiff") to take a judgment on his claims against Defendants, in the total amount of ten thousand dollars and zero cents (\$10,000.00), plus reasonable attorneys' fees and taxable costs as determined by the Court.

PLEASE TAKE FURTHER NOTICE that this offer of judgment is made for the purposes specified in Rule 68 and is not to be construed either as an admission that Defendants are liable in this action, or that Plaintiff has suffered any damage. If this offer is not accepted in writing within fourteen (14) days after it is served, it shall be deemed withdrawn.

Dated: September 22, 2022

KAUFMAN DOLOWICH & VOLUCK, LLP

By: /s/ Brett A. Scher

Brett A. Scher, Esq.
Adam M. Marshall, Esq.
Attorneys for Defendant
Kirschenbaum & Phillips, P.C.
135 Crossways Park Dr., Suite 201
Woodbury, New York 11797
(516) 681-1100

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Peter G. Siachos

Peter G. Siachos, Esq.

Attorneys for Defendant

LVNV Funding, LLC

18 Columbia Turnpike, Suite 200

Florham Park, NJ 07932

(973) 549-2500

To: Daniel A. Schlanger, Esq.
Arjun Shah, Esq.
Schlanger Law Group LLP
Attorneys for Plaintiff
80 Broad Street, Suite 1301
New York, NY 10004
(212) 500-6114
(Via Regular Mail & Email)

Jason Mays, Esq. Hudson Valley Justice Center Co-counsel for Plaintiff 19 Court Street, Suite 204 White Plains, NY 10601 (914) 308-3490 (Via Email)